

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:	*	
	*	
CHARLES MARTIN	*	Case 20-18680-MCR
	*	Chapter 7
Debtor	*	

* * * * *

**TRUSTEE'S REPLY TO DOCKET 527 - DEBTOR'S RESPONSE AND OPPOSITION
TO THE TRUSTEE'S MOTION TO SELL REAL PROPERTY LOCATED AT
3910 HAYWARD AVENUE, BALTIMORE, MD 21215**

Cheryl E. Rose, the Chapter 7 Trustee of the above captioned bankruptcy estate, by and through her counsel, Cheryl E. Rose, Esq. and Rose & Associates, LLC, responds to the Docket 527 - Debtor's Response and Opposition to the Trustee's Motion to Sell Real Property Located at 3910 Hayward Avenue, Baltimore, Maryland 21215 and states as follows:

1. It is unclear what grounds the Debtor is objecting to in his latest Response and Opposition as an Order was entered in this case on October 29, 2021 (Docket 361) authorizing the Trustee to operate the Debtor's limited liability companies. By that authority, the Trustee is selling the bankruptcy estate's interest in said real properties upon approval of this Court.
2. The Debtor does not have standing in this case to object to this sale or to request a continuance due to the Debtor's own actions in this case as the administrative expenses are presently higher than any monies the Trustee has received. In addition, the Debtor has failed to obey the Orders of this Court to pay the sanctions previously ordered (See Dockets 393 and 446).
3. Although Debtor asserts that proper service has not been effectuated, pursuant to

the Operating Agreement of MY1STHOUSE.COM, LLC, the title owner of the property, Mr. Martin is the 100% owner of that entity. See Pages 4, 6 and 21 of that document previously provided by the Debtor as Exhibit A attached hereto. Additionally, the Estate is only selling this asset “as is” and the Purchaser understands that it must deal with any liens or other obligations attached to this property.

4. The Debtor is asserting that he needs “super competent legal counsel” to assist him in this matter. Mr. Martin has used this same dilatory tactic throughout this bankruptcy case and has yet to obtain any counsel let alone “super competent legal counsel”. Further this Debtor should not be allowed at this juncture to participate in this case when he has failed to attend the originally scheduled Chapter 7 §341 meeting or the two continued §341 meetings.

5. As usual, Mr. Martin is blaming everything and everyone else but himself for the difficulties that have arisen in this case. It is clear that only Mr. Martin and his actions have made this case difficult.

6. The Trustee has no confidence that the Debtor can provide any assistance in this case when his actions to date have only seriously complicated this case. He has never provided any “assistance” he has only provided roadblocks to the administration of this case.

WHEREFORE, the Trustee requests that the Court (1) denies the Debtor’s latest Response and Opposition to the Trustee’s Motion to Sell Real Property Located at 3910 Hayward Avenue, Baltimore, Maryland 21215; (2) and grant such other and further relief as it deems just.

Respectfully submitted,

ROSE & ASSOCIATES, LLC

/s/ Cheryl E. Rose

Cheryl E. Rose, Chapter 7 Trustee, #05934
9812 Falls Road, #114-334
Potomac, MD 20854
(301) 527-7789

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of May, 2024, copy of the foregoing Trustee's Reply to Docket 527 - Debtor's Response and Opposition to the Trustee's Motion to Sell Real Property Located at 3910 Hayward Avenue, Baltimore, Maryland 21215 will be served electronically by the Court's CM/ECF system on the following:

- **Glenna Elizabeth Barner** Glenna.Barner@maryland.gov
- **Leah Christina Freedman** bankruptcy@bww-law.com, leah.freedman@bww-law.com
- **Marie Louise Hagen** mlh@mlhagenlaw.com
- **Keith R. Havens** Keith.R.Havens@HavensLawFirm.com, Madeline.Reed@HavensLawFirm.com
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- **L. Jeanette Rice** Jeanette.Rice@usdoj.gov, USTPRegion04.GB.ECF@USDOJ.GOV
- **Cheryl E. Rose** trusteeose@aol.com, crose@ecf.axosfs.com
- **Roger Charles Simmons** rsimmons@gordonsimmons.com, dwise@gordonsimmons.com; jdziubla@gordonsimmons.com
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- **Brett Weiss** brett@bankruptcylawmaryland.com, brettecf@gmail.com; TheWeissLawGroup@jubilee bk.net; chetan@BankruptcyLawMaryland.com; kbanks@bankruptcylawmaryland.com

I HEREBY FURTHER CERTIFY that on this 7th day of May, 2024, a copy of the foregoing Trustee's Reply to Docket 527 - Debtor's Response and Opposition to the Trustee's Motion to Sell Real Property Located at 3910 Hayward Avenue, Baltimore, Maryland 21215 was mailed first class mail, postage prepaid to the following:

James H. Brandon
16905 Germantown Road
Germantown, MD 20874

Charles Martin
5803 Lowery Lane
Upper Marlboro, MD 20772
(also sent via email)

United States Marshals Service
Attention: Mathew Silverman, Chief
6500 Cherrywood Lane
Greenbelt, MD 20770

Andrew A. Werner
REMAX Realty Group
6 Montgomery Village Ave., Suite 200
Gaithersburg, MD 20879

/s/ Cheryl E. Rose
Cheryl E. Rose, #05934